

## Modern Slavery Statement for financial year 2019

This statement has been created in line with the Modern Slavery Act 2015 and sets out the steps that Sewell take and continue to take, to ensure that modern slavery and/or human trafficking does not take place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Sewell have a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### Our Business

Sewell are a multi-disciplined group of companies operating across the Yorkshire region in Construction, Facilities Management, Investment partnerships and Retail.

We have a strong culture and set of values setting expectations of our people to do the right thing, not just for the environment, but for our people, supply chain, communities and business.

### Our Supply Chain

The Group has a diverse collection of supply chain companies based across the UK, and have division specific systems and 'champions' to monitor and manage these. All suppliers are required to complete questionnaires and provide business information as part of their registration as a preferred supplier of Sewell.

### Our policies

We operate a number of internal policies across the individual divisions to ensure that we are conducting business in an ethical and transparent manner. These are extended to our supply chain and more information on these is outlined below.

1. Anti-Fraud, Bribery & Corruption policy. This policy states a zero tolerance approach to these behaviours and to the deterrent of inappropriate practices within the business linked to this.
2. Code of conduct on Company business policy. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
3. Equal Opportunities & Dignity at Work policy. Governed by the Equality act, this policy explains the manner in which we treat and care for our people, customers, supply chain and potential recruits, ensure dignity, respect and fairness is promoted at all levels across the Group.

### Training

Whilst training has not been completed to date on the Modern Slavery Act, it is the intention of the business to train key policy makers and people in influential roles linked to our people, business and supply chain during 2019 and further.

### Due Diligence


The individual Group divisions undertake a measure of all supply chain companies that engages with the business, and work in 2019/2020 will consider any potential changes to supply chain and tender processes to ensure adherence to the Modern Slavery Act.

### Areas of Risk

We recognise the diversity of our supply chain across the business, and see the core risks being the supply of goods and services across the group which may have involvement in human slavery, trafficking and/or any other form of exploitation. To mitigate this risk, during 2019/2020, a review of current due diligence will be completed and amendments put in place where necessary to ensure appropriate workings.

### Approval for this statement

This statement was approved by the Board of Directors on 10 April 2019.

Name: DAVID LEEDHAM  
Signature:   
Date: 10th Apr. 2019